

### Remarks

Claims 1-33 are pending in this application. Claims 1, 2, 5, 6, 9-15, 20, 21, 24-31 have been amended.

Applicants thank the Examiner for the response in the Office Action to the arguments presented January 23, 2003. Applicants respectfully request reconsideration and withdrawal of the Flick reference in view of the comments below.

Applicants respectfully submit that the rejection of the claims based on the Flick reference fails to consider the ordinary meaning of the terms "individually conductive fibers". Flick teaches the use of nylon fibers. Flick further teaches that to obtain conductivity in its apparatus, a metalized coating must be applied. Thus, the Nylon fibers per se in Flick are not conductive. It is the metalized coating which is conductive. This is further supported by the fact that nylon is a compound which is known to have good electrical resistance. Resistivity is the opposite of conductivity.

Applicants' invention, on the other hand, incorporates individually conductive fibers into a fabric-based system to produce a sensor. Applicants' fibers are each individually conductive fibers. In the ordinary meaning, this means that each individually conductive fiber of Applicants' sensor when taken individually (taken alone) is conductive. Thus, there is no need for the application of a coating to present conductivity as in Flick since in Applicants' invention the fibers are already conductive. Applicants' interpretation is consistent with, for example, the dictionary meaning of the term individual as "existing as a distinct entity". See Merriam-Webster Dictionary. Thus, as recited in Applicants' claim 1, Applicants' sensor comprises a fully-conductive fabric of one or more integrated individually conductive fibers, i.e., fibers which when existing as a distinct entity are conductive.

In order to clarify what Applicants intend by the above ordinary meaning of the phrase "individually conductive fibers", Applicants have amended Claims 1 and 14 so that the fibers are individually conductive (i.e., when taken as a distinct entity prior to incorporation into the sensor they are conductive) and that it is the fiber which is conductive without requiring the application of a coating external to the fabric which comprises the sensor or to the fibers which make up the

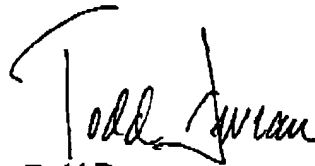
U.S.N.: 09/713,161  
Filed: November 14, 2000  
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fabric of the sensor. Applicants submit this does not present new matter as this amendment conforms claims 1 and 14 to the ordinary meaning of the words.

With respect to the rejection based on Post, Applicants have amended the claims to incorporate specific terms and phrases disclosed in Applicants' U.S. Patent 6,145,551 which provides the claims support under 35 U.S.C. 112 back to the effective filing date of September 22, 1997 of the '551 patent and traverses Post as a reference.

In view of the remarks and amendments herein, Applicants respectfully submit that all of the pending claims are now in condition for allowance. Accordingly, Applicants respectfully request that this application now be passed on for issuance.

Respectfully submitted,



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